

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Brandon J. Holmes  
Plaintiff

No. 3:16-cv-644

(Judge Munley)

vs.

(Magistrate Judge Arbuckle)

J. Eck, C. Pizzoli, M. Russo, and  
B. Mottern, Et al...  
Defendants

SUPPLEMENTAL COMPLAINT

On March 10, 2015 at approximately 7:32 AM while in the second floor shower stall on J-Block Unit of U.S.P. Lewisburg. I was having a conversation with another prisoner when Officer J. Eck entered the shower and stated: Holmes shut the fuck up, your nothing but a coward and I don't want to hear all of your bullshit.

I responded by saying I may not be the biggest or baddest dude in the world, but I'm damn sure not a coward.

Officer J. Eck stated what are you going to do if I open your shower door and punch you in your face?

I responded by saying that im going to do what any man or woman would do and thats defend my self.

Officer J. Eck stated well we're about to find out, than left out of the shower and came back with Officers B. Mattern, M. Russo and C. Pizzoli, (opened my shower stall door without me being in hand restraints and used his left hand to strike me on my chest area.

I felt that my life was endanger when the other officers Officers B. Mattern, M. Russo, and than C. Pizzoli also engaged in the assault by striking me with closed fist and batons to my head and every where else they could inflict pain to my body.

Therefore i had no choice but to defend my self.

As i defended myself as best i could against this malicious and sadistical assault. Medical Care Provider F. Alama walked by and visually witness what was taking place and pressed his body alarm. At this time i was in so much pain, and was over powered and placed on the shower floor, where i complied and was than placed in hand restraints with blood running from several areas of my body.

Then several officers, Unknown "John Does" arrived on the scene and replaced the first attackers. Several minutes went by with me being on the shower floor with these other officers Unknown "John Does" striking me with closed fist from time to time, while im yelling out telling the officers Unknown John Does to stop striking me.

After a while i was escorted to the third floor of J-Block unit and placed in four point restraints, where the ankle restraints were placed on top of the open wounds of my left ankle very tight.

Then nurse Fehringes Matthew conducted a medical assessment of some of my injuries.

After all the staff and medical employees left out of the four point restraint cell, around ten minutes later two Unknown John Doe officers along with a Unknown "John Doe" lieutenant returned back into the four point cell. The Unknown "John Doe" lieutenant removed the left side of my hand restraints, grabbed my left hand and arm and pulled me as hard as he and the other two officers could until my body lifted up off the bed, then placed my left hand back into the hand restraints extremely tight. Then stated have a nice day boy before walking out the cell, leaving me in serious pain.

Upon being in Four Point restraints for well over 24 hours, "Upon Request" I was denied the right to eat or use the restroom by every John Doe official that monitored me. And I had to urinate and lay in my own feces.

The only person who gave me any food after 24 hours was L.T. H. Ferguson, which was a hand full of tater tots and a piece of hamburger meat from his hand.

Around two hours later I was removed from four point restraints and placed in full body ambulatory restraints for over 24 hours as well.

### Relief

The Plaintiff request monetary compensation from each defendant, in the form of compensatory damages for all injuries caused and for pain in suffering along with punitive damages from each defendant.

April 9th 2018

Beverly Holmes

Mailed per Prison Mail Box Rules